

PROPOSED ORDER

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION,
et al.,

Debtors.

Chapter 11

Case No.: 18-23538 (RDD)
Jointly Administered

**ORDER ALLOWING AND COMPELLING PAYMENT OF ADMINISTRATIVE
EXPENSE CLAIM OF VEHICLE SERVICE GROUP, LLC D/B/A ROTARY, A
DOVER COMPANY, UNDER 11 U.S.C. §§ 503(B)(1) AND 503(B)(9)**

Upon the *Motion of Vehicle Service Group, LLC d/b/a Rotary, a Dover Company, for Allowance and Payment of Administrative Expense Claim under 11 U.S.C. §§ 503(b)(1) and 503(b)(9)* (the “Motion”); and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and all objections to the Motion, if any, having been withdrawn, resolved, or overruled; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, creditors, and all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and the Court having determined the legal and factual basis set forth in the Motion establish just cause for the relief granted herein; and upon the record of the hearing on _____, 2019; and after due deliberation and sufficient cause appearing therefor, it is:

ORDERED that the Motion is GRANTED; and it is further

ORDERED that Vehicle Service Group d/b/a Rotary, a Dover Company (“VSG”) is granted an allowed administrative expense claim against the Debtors pursuant to 11 U.S.C. § 503(b)(1) in the amount of \$168,915.17; and it is further

ORDERED that VSG is granted an allowed administrative expense claim against the Debtors pursuant to 11 U.S.C. § 503(b)(9) in the amount of \$33,030.65; and it is further

ORDERED that the Debtors are directed to pay VSG \$201,945.82 in cash within three (3) days of the date of this Order; and it is further

ORDERED that this Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: August __, 2019
New York, New York

PROPOSED

HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE